

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHERN DISTRICT

CYNTHIA K. HAYNES)
(a/k/a Cynthia K. Randolph),)
individually and under the Missouri Wrongful)
Death Statute,)
Plaintiffs,)
v.) Cause No. 1:21-CV-00160-ACL
JENNIFER WILLIAMS, individually)
JENNIFER WILLIAMS,) JURY TRIAL DEMANDED
d/b/a WILLIAMS LAW)
SPAIN, MILLER, GALLOWAY & LEE, LLC)
A Missouri limited liability company,)
BERNICE HAYNES, individually and)
CHARLES HAYNES, individually)
Defendants.)

DEFENDANT BERNICE HAYNES'S MOTION TO DISMISS

COMES NOW Defendant Bernice Haynes, by counsel, and pursuant to Rule 12(b)(6) states to the Court as follows:

1. Plaintiff Cynthia Haynes alleges that Defendant Bernice Haynes caused the suicide of Bernice's granddaughter, M.H.
2. The claim against Bernice should be dismissed because Cynthia has not and cannot allege facts to meet the proximate cause standard in a wrongful death suicide case.
3. For these and other reasons discussed in Bernice's Memorandum in Support, the claims against Bernice should be dismissed.

WHEREFORE, Defendant Bernice Haynes prays that the Court grant her Motion to Dismiss, and for such other and further relief as is just and proper under the circumstances.

Respectfully submitted,

THE LIMBAUGH FIRM
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By /s/ John C. Steffens
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ATTORNEYS FOR DEFENDANT BERNICE
HAYNES

CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2022, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all attorneys of record.

/s/ John C. Steffens